State: Iowa TN: IA 18-014

Effective: Supersedes: IA-17-003

Attachment 3.1-C

Page 44

	Di	scovery Activities			Remediation	
Requirement	Discovery Evidence	Discovery	Monitoring		Remediation Responsibilities	
	(Performance Measures)	Activity (Source of Data & sample size)	Responsibilities (Agency or entity	Frequency	(Who corrects, analyzes, and aggregates remediation activities; required	Frequency (Analysis and
	measures)	Data & sample size)	that conducts		timeframes for remediation)	Aggregation)
			discovery			1188.686
			activities)		,	
Service plans	SP-1: The IME shall	Member service plans	State Medicaid	Data is	The MCO ensures that the Case	Data is
address assessed	measure the number	are reviewed at a 95%	Agency &	Collected	Manager, Community-based Case	Aggregated
needs of 1915(i)	and percent of service	confidence level on a	Contracted	Monthly	Manager or Integrated Health Home	and Analyzed
participants, are	plans that accurately	three-year cycle. Data	Entity (Including		Care Coordinator has addressed the	Continuously
updated annually,	reflect the member's	is inductively analyzed	MCOs)		member's health and safety needs in the	and Ongoing
and document	assessed needs. The	and reported to the			member's service or treatment plan.	
choice of services	assessed needs must	state.				
and providers.	include, at a minimum,				The Medical Services Unit utilizes	
	personal goals, health				criteria to grade each reviewed service	
	risks, and safety risks.	The Medical Services			plan component. If it is determined that	
		Unit utilizes criteria to			the service plan does not meet the	
	Numerator = # of	grade each reviewed			standards for component(s), the case	
	service plans that	service plan			manager is notified of deficiency and	
	address all member	component. If it is			expectations for remediation. MCOs are	
	assessed needs	determined that the			responsible for oversite of service plans	
	including health and	service plan does not			for their members.	
	safety risks, and	meet the standards for			TI WARE ON THE OWNER OF THE OWNER OWNER OF THE OWNER OWN	
	personal goals.	component(s), the case			The HCBS Quality Oversight Unit has	
	5	manager is notified of			identified questions and answers that	
	Denominator = # of	deficiency and			demand additional attention. These	
	reviewed service plans	expectations for			questions are considered urgent in nature	
		remediation. MCOs are			and are flagged for follow-up. Based on	
		responsible for oversite			the responses to these flagged questions,	
		of service plans for their members.			the HCBS interviewer performs education to the member at the time of	
		their members.				
		The HCBS Quality			the interview and requests additional information and remediation from the	
		Oversight Unit has			case manager.	
		identified questions and			case manager.	
		answers that demand			General methods for problem correction	
		additional attention.			at a systemic level include informational	
		These questions are			letters, provider training, collaboration	
		considered urgent in			with stakeholders and changes in policy.	
					with stakeholders and changes in policy.	
		nature and are flagged				

TN: Effective:

Approved: Supersedes: IA-17-003

Attachment 3.1-C

Page 45

SP-2: The IME will measure the number and percent of service plans which are updated on or before the member's annual due date.  Numerator = # of service plans updated prior to due date;  Denominator = # of service plans reviewed	for follow-up. Based on the responses to these flagged questions, the HCBS interviewer performs education to the member at the time of the interview and requests additional information and remediation from the case manager.  General methods for problem correction at a systemic level include informational letters, provider training, collaboration with stakeholders and changes in policy.  Member service plans are reviewed at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.  See SP-1 Above	State Medicaid Agency & Contracted Entity (Including MCOs)	Data is Collected Monthly	See SP-1 Above	Data is Aggregated and Analyzed Quarterly
SP-3 The IME will measure the number and percent of service plans which were revised when warranted by a change in the	Member service plans are reviewed at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.	State Medicaid Agency & Contracted Entity (Including MCOs)	Data is Collected Monthly	See SP-1 Above	Data is Aggregated and Analyzed Quarterly

§1915(i) State plan HCBS

Attachment 3.1-C Page 46

Effective: Approved:

member's needs.	See SP-1 Above				
Numerator = # of service plans updated or revised when warranted by changes to the member's needs.  Denominator = # of reviewed service plans					
SP-4: The IME will measure the # and percent of members' service plans that identify all the following elements; amount, duration, and funding sources of all services and all services authorized in the service plan were provided as verified by supporting documentation.  Numerator: # members receiving services authorized in their service plan;  Denominator = # of service plans reviewed.	Member service plans are reviewed at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.  See SP-1 Above	State Medicaid Agency & Contracted Entity (Including MCOs)	Data is Collected Monthly	See SP-1 Above	Data is Aggregated and Analyzed Quarterly
SP-5: The IME will measure the number and percentage of members from the HCBS IPES who responded that they had a choice of services	Member service plans are reviewed at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.	State Medicaid Agency & Contracted Entity (Including MCOs)	Data is Collected Monthly	See SP-1 Above	Data is Aggregated and Analyzed Quarterly

§1915(i) State plan HCBS

Attachment 3.1-C Page 47

Effective: Approved:

	Numerator = # of IPES respondents who stated that they were a part of planning their services;  Denominator = # of IPES respondents that answered the question asking if they were a part of planning their services.  SP-6: The IME will measure the number and percentage of service plans from the HCBS QA survey review that indicated the member had a choice of providers.  Numerator: The total number of service plans reviewed which demonstrate choice of HCBS service providers;  Denominator: The total number of service plans reviewed	Member service plans are reviewed at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.  See SP-1 Above	State Medicaid Agency & Contracted Entity (Including MCOs	Data is Collected Monthly	See SP-1 Above	Data is Aggregated and Analyzed Quarterly
Providers meet	QP-1: The IME will	Encounter data, claims			Contracted Entities (Including MCOs)	Data is
required qualifications.	qP-1: The IME will measure the number and percent of licensed or certification waiver provider enrollment applications verified against the appropriate licensing and/or certification entity.	encounter data, claims data and enrollment information out of ISIS. All MCO HCBS providers must be enrolled as verified by the IME Provider services.	Contracted Entity (Including MCOs)	Data is Collected Monthly	Contracted Entities (Including MCOs) manage the provider networks and do not enroll providers who cannot meet the required qualifications.  If it is discovered by Provider Services Unit during the review that the provider is not compliant in one of the enrollment and reenrollment state or federal provider	Data is Aggregated and Analyzed Quarterly

State: Iowa

TN:

Effective: Approved: Supersedes: IA-17-003

Numerator = # and percent of waiver providers verified against appropriate licensing and/or certification entity prior to providing services.

Denominator = # of licensed or certified waiver providers.

The IME Provider Services unit is responsible for review of provider licensing, certification, background checks of relevant providers, and determining compliance with provider service and business requirements prior to initial enrollment and reenrollment. All MCO providers must be enrolled as verified by IME Provider Services.

The Home and Community Based Services (HCBS) quality oversight unit is responsible for reviewing provider records at a 100% level over a three to five year cycle, depending on certification or accreditation. If it is discovered that providers are not adhering to provider training requirements, a corrective action plan is implemented. If corrective action attempts do not correct noncompliance, the provider is sanctioned for noncompliance and eventually disenrolled or terminated if

requirements, the provider is required to correct deficiency prior to enrollment or reenrollment approval. Until the provider makes these corrections, they are ineligible to provide services to waiver members. All MCO providers must be enrolled as verified by IME Provider Services, so if the provider is no longer enrolled by the IME then that provider is no longer eligible to enroll with an MCO.

Attachment 3.1-C

Page 48

If it is discovered during HCBS Quality Oversight Unit review that providers are not adhering to provider training requirements, a corrective action plan is implemented. If corrective action attempts do not correct noncompliance, the provider is sanctioned for noncompliance and eventually disenrolled or terminated is noncompliance persists.

General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and required changes in individual provider policy.

§1915(i) State plan HCBS

Attachment 3.1-C Page 49

Effective: Supersedes: IA-17-003

Data is inductively analyzed at a 100% level.		Approved.			3aperseaes. 17( 17 005	
Data is inductively analyzed at a 100% level.  OP-2: The IME will measure the total number and percent of providers, that meet training requirements as outlined in State regulations.  Numerator = # of reviewed HCBS providers which did not have a corrective action plan issued related to training;  Denominator = # of HCBS waiver providers that had a certification or periodic quality assurance review  . The IME Provider service and business requirements and ectermining compliance with providers service and business requirements. All MCO providers survice and business requirements and ectermining compliance with provider service and business requirements providers service and business requirements. All MCO providers must be emrolled as verified by IME Provider Services (HCBS) quality westers that had a corrective service and business requirements prior to initial carcollment and reemfollment. All MCO providers must be emrolled as verified by IME Provider Services.  The Home and Community Based Services (HCBS) quality weight until is						
measure the total number and percent of providers, that meet training; certification or periodic quality assurance review  The HCBS waiver providers that had a certification or periodic quality assurance review  The HCBS waiver providers when that had a certification or periodic quality assurance review  The HCBS waiver providers when that had a certification or periodic quality assurance review  The HCBS waiver providers when the fact as a construction or periodic quality assurance review  The HCBS waiver providers when the had a certification or periodic quality assurance review  The HCBS waiver providers when the had a certification or periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the provider service and business requirements prior to initial enrollment and reenrollment.  All MCO providers must be enrolled as verified by IME provider Services.  The Home and Community Based Services (HCBS) quality oversight unit is		.Data is inductively analyzed at a 100%				
measure the total number and percent of providers, that meet training; certification or periodic quality assurance review  The HCBS waiver providers that had a certification or periodic quality assurance review  The HCBS waiver providers when that had a certification or periodic quality assurance review  The HCBS waiver providers when that had a certification or periodic quality assurance review  The HCBS waiver providers when the fact as a construction or periodic quality assurance review  The HCBS waiver providers when the had a certification or periodic quality assurance review  The HCBS waiver providers when the had a certification or periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the had a certification of periodic quality assurance review  The HCBS waiver providers when the provider service and business requirements prior to initial enrollment and reenrollment.  All MCO providers must be enrolled as verified by IME provider Services.  The Home and Community Based Services (HCBS) quality oversight unit is						
	measure the total number and percent of providers, that meet training requirements as outlined in State regulations.  Numerator = # of reviewed HCBS providers which did not have a corrective action plan issued related to training;  Denominator = # of HCBS waiver providers that had a certification or periodic quality	reports are used to retrieve data associated with the number reviewed providers who meet training requirements. Data is inductively analyzed of 100% sample spread over 5 years.  The IME Provider Services unit is responsible for review of provider licensing, certification, background checks of relevant providers, and determining compliance with provider service and business requirements prior to initial enrollment and reenrollment.  All MCO providers must be enrolled as verified by IME Provider Services.  The Home and Community Based Services (HCBS)	Entity (Including	Collected Continuously	See QP-1 Above	Aggregated and Analyzed

State: Iowa

TN:

Effective: Approved:

Attachment 3.1-C

Page 50 Supersedes: IA-17-003

Settings meet the home and community-based setting requirements as specified in this SPA and in accordance with 42 CFR 441.710(a)(1) and (2).	SR-1: Number and percent of service plans which indicate that the member resides in a setting that meets the HCB setting requirements.  Numerator: The total number of service plans reviewed which indicate that the member resides in a setting that meets the HCB setting requirements  Denominator: The total number of service plans reviewed.	records at a 100% level over a three to five year cycle, depending on certification or accreditation. If it is discovered that providers are not adhering to provider training requirements, a corrective action plan is implemented. If corrective action attempts do not correct noncompliance, the provider is sanctioned for noncompliance and eventually disenrolled or terminated if noncompliance persists.  Member service plans are reviewed annually, and more frequently as member needs require, at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.	Contracted Entity (Including MCOs)	Data is Collected Continuously and Ongoing	Contracted Entities (Including MCOs) ensure that Case Managers or Integrated Health Home Care Coordinators have addressed the member's health and safety risks during service authorization. The IME Medical Services Unit completes the QA Service Plan Desk Review within 10 days of receipt of the information from the member's HCB service provider(s) and the Case Manager or IHH Care Coordinator. The IME Medical Services Unit will send the review results to the MCO and the Case Manager or Integrated Health Home Coordinator within 2 business days of completing the review.	Data is Aggregated and Analyzed Quarterly
---	---	---	------------------------------------	---	---	--

§1915(i) State plan HCBS

State: Iowa TN:

Effective: Approved:

Attachment 3.1-C Page 51

	SR-2: Number and percent of service plans which indicate that the member is receiving services in a setting that meets the HCB setting requirements.  Numerator: The total number of service plans reviewed which indicate that the member resides in a setting that meets the HCB setting requirements  Denominator: The total number of service plans reviewed.	Member service plans are reviewed annually, and more frequently as member needs require, at a 95% confidence level on a three-year cycle. Data is inductively analyzed and reported to the state.	Contracted Entity (Including MCOs)	Data is Collected Continuously and Ongoing	Contracted Entities (Including MCOs) ensure that Case Managers or Integrated Health Home Care Coordinators have addressed the member's health and safety risks during service authorization. The IME Medical Services Unit completes the QA Service Plan Desk Review within 10 days of receipt of the information from the member's HCB service provider(s) and the Case Manager or IHH Care Coordinator. The IME Medical Services Unit will send the review results to the MCO and the Case Manager or Integrated Health Home Coordinator within 2 business days of completing the review.	Data is Aggregated and Analyzed Quarterly
The SMA retains authority and responsibility for program operations and oversight.	AA-1: The IME shall measure the number and percent of required MCO HCBS Performance Measure Quarterly reports that are submitted timely.  Numerator: # of MCO HCBS Performance Measure Quarterly Reports submitted timely  Denominator: # of MCO HCBS Performance Measure Quarterly Reports submitted timely  Denominator: # of MCO HCBS Performance Measure Quarterly reports due in a calendar quarter.	Contracted Entity and MCO performance monitoring.  Data is inductively analyzed at a 100% level. Through the Bureau of Managed Care each MCO is assigned state staff as the contract manager; and other state staff are assigned to aggregate and analyze MCO data. This staff oversees the quality and timeliness of monthly reporting requirements.  Whenever data is late or missing the issues are	State Medicaid Agency and Contracted Entity (Including MCOs	Data is reported Monthly	Each MCO contract manager is responsible for ensuring that the MCO submits reports timely. If the contract manager, or policy staff as a whole, discovers and documents a repeated deficiency in performance of the MCO, a plan for improved performance is developed. In addition, repeated deficiencies in contractual performance may result in a withholding of payment compensation.  General methods for problem correction include revisions to state contract terms based on lessons learned.	Data is Aggregated and Analyzed Quarterly

§1915(i) State plan HCBS

Attachment 3.1-C Page 52

Effective: Approved:

	immediately addressed by each MCO account manager to the respective MCO.				
AA-2: The IME shall measure the number and percent of months in a calendar quarter that each MCO reported all HCBS PM data measures.  Numerator = # of months each MCO entered all required HCBS PM data;  Denominator = # of reportable HCBS PM months in a calendar quarter	Contracted Entity performance monitoring.  Data is inductively analyzed at a 100% level.  See AA-1 Above	State Medicaid Agency and Contracted Entity (Including MCOs	Data is Collected Monthly	See AA-1 Above	Data is Aggregated and Analyzed Quarterly

Attachment 3.1-C

Supersedes: IA-17-003

Page 53

State: Iowa TN:

Effective: Approved:

The SMA maintains financial accountability through payment of claims for services that are authorized and furnished to 1915(i) participants by qualified providers.	FA-1: The IME will determine the number and percent of FFS reviewed claims supported by provider documentation.  Numerator = # of reviewed paid claims where documents supports the units of service;  Denominator = # of reviewed paid claims	The Program Integrity (PI) unit requests service documentation from providers and cross-walks with claims. The Unit utilizes an algorithm that establishes providers exceeding the norm rate and unit charged. Per the contract with IME, the PI unit is required to review 0.5% of MMIS paid claims. PI will review 100% of the claims based on their request for claims that meet certain criteria.	Contracted Entity (Including MCOs)	Data is Collected Quarterly	When the Program Integrity unit discovers situations where providers are missing documentation to support billing or coded incorrectly, monies are recouped and technical assistance is given to prevent future occurrence.  When the lack of supporting documentation and incorrect coding appears to be pervasive, the Program Integrity Unit may review additional claims, suspend the provider payments; require screening of all claims, referral to MFCU, or provider suspension.  The data gathered from this process is stored in the Program Integrity tracking system and reported to the state on a quarterly basis. If during the review of capitation payments the IME determines that a capitation was made in error, that claim is adjusted to create a corrected payment.	Data is Aggregated and Analyzed Quarterly
	FA-2: The IME will determine the number of clean claims that are paid by the managed care organizations within the timeframes specified in the contract  Numerator = # of clean claims that are paid by the managed care organization within the timeframes specified in the contract;  Denominator = # of Managed Care provider	MCO claims data is compared to the contractual obligations for MCO timeliness of clean claim payments. Data is provided to the HCBS staff as well as to the Bureau of Managed Care.  Data sources includes; Claims Data, adjudicated claims summary, claims aging summary, and claims lag report	Contracted Entity (Including MCOs)	Data is Collected Quarterly	See FA-1 Above	Data is Aggregated and Analyzed Quarterly

§1915(i) State plan HCBS

Attachment 3.1-C Page 54

Effective: Approved:

claims.					
FA-3: The IME will measure the number and percent of claims that are reimbursed according to the Iowa Administrative Code approved rate methodology for the services provided.  Numerator = # of reviewed claims paid using IME-approved rate methodologies;  Denominator = # of reviewed paid claims.	See FA-2	Contracted Entity (Including MCOs)	Data is Collected Quarterly	See FA-2 Above	Data is Aggregated and Analyzed Quarterly
FA-4: The IME will measure the number of capitation payments to the MCOs that are made in accordance with the CMS approved actuarially sound rate methodology.  Numerator: # of Capitation payments made to the MCOs at the approved rates through the CMS certified MMIS.  Denominator: # of capitation payments made through the CMS certified MMIS.	See FA-2	Contracted Entity (Including MCOs)	Data is Collected Quarterly	See FA-2	Contracted Entity (Including MCOs)

State: Iowa §1915(i) State plan HCBS Attachment 3.1-C Page 55

TN: Page 55
Effective: Approved: Supersedes: IA-17-003

The state	IIII DE U	The HCBS Quality	G 1	Data is	The HCBS Incident Reporting Specialist	D
identifies,	HW-1: The IME will	Assurance unit and	Contracted	Collected	and each MCO analyzes data for	Data is
addresses and	measure the total	each MCO is	Entity (Including	Monthly,	individual and systemic issues.	Aggregated
seeks to prevent	number and percent of	responsible for	MCOs)		Individual issues require communication	and Analyzed
incidents of abuse,	IAC-defined major	monitoring and			with the case manager to document all	Monthly,
neglect, and	critical incidents	analyzing data			efforts to remediate risk or concern. If a	Quarterly and
exploitation,	requiring follow-up	associated with the			these efforts are not successful, staff	Annually
including the use	escalation that were	major incidents			continues efforts to communicate with	
of restraints.	investigated.	reported for members			the case manager, the case manager's	
		on waivers. Data is			supervisor, and protective services when	
	Numerator = # of	pulled from the data			necessary. All remediation efforts of this	
	critical incidents that	warehouse and from			type are documented in the monthly and	
	received follow-up as	MCO reporting on a			quarterly reports.	
	required;	regular basis for			1	
		programmatic trends,			The HCBS Specialists conducting	
	Denominator = # of	individual issues and			interviews conduct individual	
	critical incidents	operational concerns.			remediation to flagged questions. In the	
	requiring follow-up	Reported incidents of			instance that a flagged question/response	
	escalation	abuse, medication error,			occurs, the Specialist first seeks further	
		death, rights			clarification from the member and	
		restrictions, and			provides education when necessary.	
		restraints are			Following the interview, the case	
		investigated further by			manager is notified and information	
		the HCBS Incident			regarding remediation is required within	
		Reporting Specialist as			30 days. This data is stored in a database	
		each report is received.			and reported to the state on a quarterly	
		The analysis of this data			and annual basis. MCO are responsible	
		is presented to the state			for research and follow up to flagged	
		on a quarterly basis.			responses.	
					General methods for problem correction	
					at a systemic level include informational	
					letters, provider trainings, collaboration	
					with stakeholders and changes to	
		The HCBS provider			provider policy.	
		oversight unit, and each				
		MCO, is responsible for				
		conducting IPES				
		interviews with waiver				

§1915(i) State plan HCBS

Attachment 3.1-C Page 56

Effective: Approved: Supersedes: IA-17-003

members. The IPES	
tool has been expanded	
based on the federal	
PES tool and thought to	
capture a more	
comprehensive view of	
Iowa's waiver	
population needs and	
issues. The IPES tool	
incorporates the seven	
principles of the	
Quality Framework and	
is able to adjust based	
on the member	
interviewed and service	
enrollment. HCBS	
Specialists conduct	
interviews either face-	
to-face or via telephone,	
to the discretion of the	
waiver member. All	
waiver members have	
the right to decline	
interview. The results	
of these interviews are	
presented to the state on	
a quarterly basis.	

§1915(i) State plan HCBS

Attachment 3.1-C Page 56

Effective: Approved:

HW-2 The IME will measure Critical Incident Reports (CRIS) that identify a reportable event of abuse, neglect, exploitation, or unexplained death and were followed upon appropriately.  Numerator = # of CIRs that identified a report was made to DHS protective services and/or appropriate follow up was initiated;  Denominator = # of CIRs that identified a reportable event of abuse, neglect, exploitation, and/or unexplained death	See HW-1 Above	Contracted Entity (Including MCOs)	Data is Collected Monthly,	See HW-1 Above	Data is Aggregated and Analyzed Monthly, Quarterly and Annually
HW-3: The IME will identify all unresolved critical incidents which resulted in a targeted review and were completed to resolution.  Numerator = # of targeted reviews resulting from an incident which were resolved within 60 days;  Denominator = # of critical incidents that	See HW-1 above	Contracted Entity (Including MCOs)	Data is Collected Monthly,	See HW-1 Above	Data is Aggregated and Analyzed Monthly, Quarterly and Annually

Attachment 3.1-C

Page 57

State: Iowa TN:

Effective: Supersedes: IA-17-003

14 . 1					
resulted in a targeted review					
review		C 1	Data to		
HW-4: The IME will measure the total # & % of providers with policies for restrictive measures that are consistent with State and Federal policy and rules, and followed as written.  Numerator = # providers reviewed that have policies for restrictive measures that were implemented as written;  Denominator = total # of providers reviewed that identified having policies for restrictive measures.	Provider's policies and procedures. All certified and periodic reviews are conducted on a 5 year cycle; at the end of the cycle all providers are reviewed ve.	Contracted Entity (Including MCOs)	Data is Collected Monthly	The Medical Services Unit utilizes criteria to grade each provider compliance area reviewed. If it is determined that the provider does not meet the standards for member's rights restrictions, the provider is notified of the deficiency and expectations for remediation. Providers submit a corrective action plan for any deficiency identified during the review  General methods for problem correction at a systemic level include informational letters, provider training, collaboration with stakeholders and changes in policy.	Data is Aggregated and Analyzed Quarterly
HW-5 The IME will measure the number and percent of providers meeting state and federal requirements relative to individual waivers.  Numerator = # of Quality Assurance reviews that did not receive a corrective action plan;  Denominator = # of provider Quality	Provider's policies and procedures. All certified and periodic reviews are conducted on a 5 year cycle; at the end of the cycle all providers are reviewed	Contracted Entity (Including MCOs)	Data is Collected Monthly	The Medical Services Unit utilizes criteria to grade each provider compliance area reviewed. If it is determined that the provider does not meet the standards for member's rights restrictions, the provider is notified of the deficiency and expectations for remediation. Providers submit a corrective action plan for any deficiency identified during the review  General methods for problem correction at a systemic level include informational letters, provider training, collaboration with stakeholders and changes in policy.	Data is Aggregated and Analyzed Quarterly

TN:

Effective: Approved: Supersedes: IA-17-003

Attachment 3.1-C

Page 58

	Assurance Reviews					
	completed					
An evaluation for 1915(i) State plan HCBS eligibility is provided to all applicants for whom there is reasonable indication that 1915(i) services may be needed in the future.	LC-1: IME will measure the number and percent of needs based eligibility decisions.  Numerator: # of completed needs based eligibility reviews  Denominator: # of referrals for needs based eligibility review	The data informing this performance measure is pulled from ISIS  Reports are pulled and data is inductively analyzed at a 100% level.	State Medicaid Agency & Contracted Entity	Data is collected monthly	The state's Medical Services Unit performs internal quality reviews of initial and annual 1915(i) eligibility determinations to ensure that the proper criteria are applied. In instances when it is discovered that this has not occurred the unit recommends that the care coordinator or community based case manager take steps to initiate a new 1915(i) eligibility determination through communication with the member and physician. General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and changes in policy.	Data is Aggregated and Analyzed Quarterly
TP1	LC 2. Th. DATE :1. 11	T1 . M . 1' . 1 C '	C(-(-)M-1''1	Data	The state Malical Continuity	Detect
The processes and instruments described in the approved state plan for determining 1915(i) eligibility are applied appropriately.	LC-2: The IME shall determine the number and percent of initial needs based eligibility decisions that were accurately determined by applying the approved needs based eligibility criterion using standard operating procedures.  Numerator: # of needs based eligibility decisions that were accurately determined by applying the correct criteria as defined in the waiver;  Denominator: # of	The Medical Services Unit performs internal quality reviews on a representative sample of the 1915(i) eligibility determinations that have been made with a 95% confidence level. Data is reported on a quarterly basis and inductively analyzed.  Data for completed needs based eligibility determinations is collected quarterly through reports generated through ISIS, MQUIDS, and OnBase. This data is monitored for trends from an individual and systems	State Medicaid Agency & Contracted Entity	Data is collected Monthly	. The state's Medical Services Unit performs internal quality reviews of initial and annual level of care determinations to ensure that the proper criteria are applied. In instances when it is discovered that this has not occurred, the unit undertakes additional training for staff	Data is Aggregated and Analyzed Quarterly

State: Iowa §1915(i) State plan HCBS Attachment 3.1-C TN: Page 59

Effective:

Approved: Supersedes: IA-17-003

	reviewed needs based	perspective to			
	eligibility	determine in procedural			
	determinations.	standards.			
		Monthly a random			
		sample of needs based			
		eligibility decisions are			
		selected from each			
		reviewer. IQC activity			
		is completed on the			
		random sample. This			
		level of scrutiny aids in			
		early detection of			
		variance from the stated			
		needs based eligibility			
		criteria			
System Improvement					

## **System Improvement:**

(Describe process for systems improvement as a result of aggregated discovery and remediation activities.)

(Describe process for systems improvement as a result of aggregated discovery and remediation activities.)					
Methods for Analyzing Data and Prioritizing Need for System Improvement	Roles and Responsibilities	Frequency	Method for Evaluating Effectiveness of System Changes		
State QA/QI system, at a minimum, addresses the following items: (1) health and safety issues of members receiving HCBS services; (2) abuse/neglect/ exploitation of members; (3) member access to services; (4) plan of care discrepancies; (5) availability of services; (6) complaints of service delivery; (7) training of providers, case managers, and other stakeholders; (8) emergency procedures; (9) provider qualifications; and (10) member choice.  Based on contract oversight and performance measure implementation, the	The IME is the single state agency that retains administrative authority of Iowa's HCBS services. Iowa remains highly committed to continually improve the quality of services for all HCBS programs. The QIS developed by Iowa stratifies all HCBS services, including the State's 1915(c) waivers and 1915(i) state plan services. Data is derived from a variety of sources including the MCOs, HCBS Provider Quality Oversight databases, site reviews, follow-up compliance reviews, compliant investigations, evaluation reports, member satisfaction surveys, member interviews, and member records.	Data is Collected Continuously and Ongoing	The IME reviews the State QIS system no less than annually. Strategies are continually adapted to establish and sustain better performance through improvements in skills, processes, and products. Evaluating and sustaining progress toward system goals is an ongoing, creative process that has to involve all stakeholders in the system. Improvement requires structures, processes, and a culture that encourage input from members at all levels within the system, sophisticated and thoughtful use of data, open discussions among people with a variety of perspectives, reasonable risktaking, and a commitment to continuous learning. The QIS is often revisited more often than annually due to the dynamic nature of Medicaid policies and regulations, as well as the changing climate of the member and provider communities.		

State: Iowa §1915(i) State plan HCBS Attachment 3.1-C TN: Page 60

Effective: Approved: Supersedes: IA-17-003

IME holds weekly policy staff and long term care coordination meetings to discuss areas of noted concern for assessment and prioritization. This can include discussion of remediation activities at an individual level, programmatic changes, and operational changes that may need to be initiated and assigned to State or contract staff.

Contracts are monitored and improvements are made through other inter-unit meetings designed to promote programmatic and operational transparency while engaging in continued collaboration and improvement. Further, a quality assurance group gathers on a monthly basis to discuss focus areas, ensuring that timely remediation and contract performance is occurring at a satisfactory level. ISIS will only be utilized for fee-for-service members.

The IME employs a Quality Assurance Manager to oversee data compilation and remediation activities. The QA Manager and State policy staff address oversight of design changes and the subsequent monitoring and analysis during the weekly policy and monthly quality assurance meetings. Prior to dramatic system design changes, the State will seek the input of stakeholders and test/pilot changes that are suggested and developed. Informational letters are sent out to all relevant parties prior to implementation with contact information of key staff involved. This workflow is documented in logs and in informational letters found within the DHS computer server for future reference. Stakeholder involvement and informational letters are requested or sent out on a weekly/monthly/ongoing basis as policy engages in the continuous quality improvement cycle.

TN:

Effective: Approved: Supersedes: IA-17-003

All contracted MCOs are accountable for improving quality outcomes and developing a Quality Management/ Quality Improvement (QM/QI) program that incorporates ongoing review of all major service delivery areas. The QM/QI program must have objectives that are measurable, realistic and supported by consensus among the MCOs' medical and quality improvement staff. Through the OM/OI program, the MCOs must have ongoing comprehensive quality assessment and performance improvement activities aimed at improving the delivery of healthcare services to members. As a key component of its QM/QI program, the MCOs must develop incentive programs for both providers and members, with the ultimate goal of improving member health outcomes.

Finally, MCOs must meet the requirements of 42 CFR 438 Subpart E and the standards of the credentialing body by which the MCO is credentialed in development of its QM/QI program. The State retains final authority to approve the MCOs' QM/QI program.

The State has developed a draft-reporting manual for the MCOs to utilize for many of the managed care contract reporting requirements, including HCBS performance measures. The managed care contract also allows for the State to request additional regular and ad hoc reports.

Based on contract oversight and performance measure implementation, the IME holds weekly policy staff and long term care coordination meetings to discuss areas of noted concern for assessment and prioritization. This can include discussion of remediation activities at an individual level, programmatic changes, and operational changes that may need to be initiated and assigned to State or contract staff. Contracts are monitored and improvements are made through other inter-unit meetings designed to promote programmatic and operational transparency while engaging in continued collaboration and improvement.

Attachment 3.1-C

Page 61

Further, a quality assurance group gathers on a monthly basis to discuss focus areas, ensuring that timely remediation and contract performance is occurring at a satisfactory level. Data from QA/QI activities is also presented to the HCBS QA/AI Committee on a quarterly basis. The QA/QI Committee reviews the data makes recommendations for changes in policy to the IME Policy staff and Bureau Chief. The Committee also uses this information to direct HCBS Provider Quality Oversight Specialists to provide training, technical assistance, or other activity. The Committee monitors training and technical assistance activities to assure consistent implementation statewide. The Committee also directs workgroups on specific activities of quality improvement and other workgroups are activated as needed.

TN:

Effective: Approved: Supersedes: IA-17-003

Iowa acknowledges that improvements are necessary to capture data at a more refined level, specifically individual remediation. While each contracting unit utilizes their own electronic tracking system or OnBase (workflow management), further improvements must be made to ensure that there are not preventable gaps collecting individual remediation. The State acknowledges that this is an important component of the system; however the terrain where intent meets the state budget can be difficult to manage.

The IME supports infrastructure development that ensures choice is provided to all Medicaid members seeking services and that these services are allocated at the most appropriate level possible. This will increase efficiency as less time is spent on service/funding allocation and more time is spent on care coordination and improvement. A comprehensive system of information and referrals ensures that all individuals are allowed fully informed choices prior to facility placement.

A comprehensive system of information and referrals shall also be developed such that all individuals are allowed fully informed choices prior to facility placement. Many program integrity and ACA initiatives will assist in system improvements. These include improvements to provider screening at enrollment, tighter sanction rules, and more emphasis on sustaining quality practices.

The Committee is made up of certain HCBS Provider Quality Oversight staff and supervisors, and IME Policy staff. Minutes are taken at each of the meetings, which show evidence that analysis of data is completed and recommendations for remediation and system improvements are made.

Attachment 3.1-C

Page 62

Finally, IME analyzes general system performance through the management of contract performance benchmarks, ISIS reports, and Medicaid Value Management reports and then works with contractors, providers, and other agencies regarding specific issues. HCBS Annual Reports are sent to the Iowa Association of Community Care Providers. Reports are also available to agencies, waiver providers, participants, families, and other interested parties upon request.

TN:

Effective: Approved: Supersedes: IA-17-003

In accordance with 42 CFR 438,202, the Reviews are The MCO uses its utilization management MCOs must comply with the standards State maintains a written strategy for Conducted Annually practices to develop interest in patterns that established by the State and must provide all assessing and improving the quality of might lead to investigative actions. All of this information and reporting necessary for the State services offered by MCOs including, but is reported to the state and authenticated as it to carry out its obligations for the State quality not limited to, an external independent can be used during onsite visits and through strategy. IME performs an annual review of each review of the quality of, timeliness of, and regular reports. The Medical Services Unit MCO. This is generally conducted at the time of access to services provided to Medicaid contractor conducts an annual EQR of each the annual External Quality Review (EQR) and beneficiaries. managed care entity to ensure that they are includes a determination of contract compliance, following the outlined QA/QI plan. including that for fraud and abuse reporting and training. EQR is performed as federally required, In addition to developing QM/QI programs that and committee reports are reviewed during an include regular, ongoing assessment of services annual visit. The MCO uses its utilization provided to Medicaid beneficiaries, MCOs management practices to develop interest in must maintain a QM/QI Committee that patterns that might lead to investigative actions. includes medical, behavioral health, and long-All of this is reported to the State and term care staff, and network providers. This authenticated as it can be used during onsite visits committee is responsible for analyzing and and through regular reports. evaluating the result of QM/QI activities, recommending policy decisions, ensuring that providers are involved in the QM/QI program, instituting needed action, and ensuring appropriate follow-up. This committee is also responsible for reviewing and approving the MCOs' QM/QI program description, annual evaluation, and associated work plan prior to submission to DHS. All contracted MCOs are accountable for MCO QM/QI programs must have objectives that Reviews are are measurable, realistic, and supported by The MCO uses its utilization management improving quality outcomes and Conducted Annually practices to develop interest in patterns that developing a Quality consensus among the MCOs' medical and quality might lead to investigative actions. All of this Management/Quality Improvement improvement staff. Through the QM/QI is reported to the state an authenticated as it can (QM/QI) program that incorporates program, the MCOs must have ongoing be used during onsite visits and through regular ongoing review of all major service comprehensive quality assessment and delivery areas. performance improvement activities aimed at reports. improving the delivery of healthcare services to members. As a key component of its QM/QI program, the MCOs must develop incentive programs for both providers and members, with the ultimate goal of improving member health

Attachment 3.1-C

Page 64

State: lowa \$1915(i) State plan HCBS Attachment 3.1-C
TN: Page 65
Effective: Approved: New

		1	_
	outcomes. Finally, MCOs must meet the		
	requirements of 42 CFR 438 subpart D and the		
	standards of the credentialing body by which the		
	MCO is credentialed in development of its		
	QM/QI program. The State retains final authority		
	to approve the MCOs' QM/QI program, and the		
	State Medical Services conducts an annual EQR		
	of each MCO to ensure that they are following		
	the outlined QA/QI plan.		
MCOs must attain and maintain	If not already accredited, the MCO must		NCQA and URAC publically report
accreditation from the National	demonstrate it has initiated the accreditation	Reviews are	summarized plan performance, as well as
Committee for Quality Assurance	process as of the MCO's contract effective date.	Conducted Every	accreditation type, accreditation expiration
(NCQA) or URAC.	The MCO must achieve accreditation at the	Three Years	date, date of next review and accreditation
	earliest date allowed by NCQA or URAC.		status for all NCQA accredited plans in a report
	Accreditation must be maintained throughout the		card available on the NCQA website. This
	life of the MCO's contract at no additional cost to		report card provides a summary of overall plan
	the State. When accreditation standards conflict		performance on a number of standards and
	with the standards set forth in the MCO's		measures through an accreditation start rating
	contract, the contract prevails unless the		comprised of five categories (access and
	accreditation standard is more stringent.		service, qualified providers, staying health,
			getting better, living with illness).
	MCOs must meet the requirements of 42 CFR		
	438 subpart D and the standards of the		
	credentialing body by which the MCO is		
	credentialed.		

State: Iowa Attachment 3.1-C TN: IA -18-.014 Effective:

Approved: Page 66
Approved: New

## STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT

State/Territory:	IOWA
State/Territory:	IOWA

## STANDARDS AND METHODS TO ASSURE HIGH QUALITY CARE

The following methods help assure quality of care and services under the Medical Assistance program.

- 1. A Medical Assistance Advisory Council assists the Department in planning the scope and content of medical services provided under the program.
- 2. The services of professional technical advisory committees are used for consultation on all services provided under the program.
- 3. Procedures exist to assure that workers in local Human Services offices are able to assist people in securing necessary medical services.
- 4. Procedures are in effect to pay for necessary transportation of recipients to and from providers of medical and health services.
- 5. The State has in effect a contract with the Iowa State Department of Inspections and Appeals to survey intermediate care facilities, intermediate care facilities for persons with intellectual disabilities and skilled nursing facilities and to certify whether they meet the conditions to participate as providers of service under the Medical Assistance program.
- 6. The Department has in effect a Utilization Review Plan for evaluation and surveillance of the quality and quantity of all medical and health services provided under the program.
- 7. Physician certification, recertification and quality of care issues for the long term care population are the responsibility of the Iowa Medicaid Enterprise's Medical Services Unit, which is the Professional Standards Review Organization in Iowa.